

REMARKS

Claims 1-27, 29-32 and 34-39 are all the claims pending in the application. Claims 28 and 33 have been cancelled.

Examiner Interview

Applicants thank the Examiner for the courtesies extended to Applicants during Examiner's telephonic interview with Applicants' representative, which took place on October 16, 2007. During the aforesaid interview, Applicants presented to the Examiner the arguments substantially as provided below and an agreement was reached with respect to claim 1 that the cited art fails to teach or suggest the claimed percolating relevance scores based on the structural representation of discourse. Thus, the Examiner has agreed to issue another non-final office action once this amendment is filed. The aforesaid agreement is outlined in the Examiner's interview summary.

Claim Rejections – 35 U.S.C. §112

The examiner has rejected claims 26 and 33 under 35 U.S.C. 112, as being allegedly indefinite. In response, Applicants cancel claims 26 and 33 without prejudice.

Claim Rejections – 35 U.S.C. §102

The Examiner has rejected claims 24-27, 29-32 and 38-39 under 35 U.S.C. §102 as being allegedly anticipated by Marcu et al. (U.S. patent publication No. 2002/0046018). Applicants respectfully traverse this rejection in view of the following arguments.

Specifically, claim 24 recites a feature of the invention, wherein a mapping between the sentential-level parse features and discourse-level parse features is being determined. This

feature of the invention is neither taught nor suggested by Marcu et al. In more detail, Marcu et al. discloses a system having a discourse structure for an input text segment determined by generating a set of one or more discourse parsing decision rules based on a training set, and determining a discourse structure for the input text segment by applying the generated set of discourse parsing decision rules to the input text segment, see Marcu et al., Abstract. In the Office Action, the Examiner states that Marcu et al. discloses the aforesaid feature of the invention, wherein a mapping between the sentential-level parse features and discourse-level parse features is being determined at paragraph [0238].

Applicants carefully examined the cited portion of Marcu et al., as well as the remainder of that reference but could not find any such teaching. Specifically, in the aforesaid paragraph [0238], Marcu et al. discusses mapping each of the large trees in the corpus into smaller trees. Thus, the portion of Marcu et al. cited by the Examiner deals exclusively with organization of tree structures and is not related to the claimed mapping between the sentential-level parse features and discourse-level parse features. Thus, Marcu et al. fails to teach or suggest the above claim limitation recited in the pending claim 24. Accordingly, without admitting that Marcu et al. teaches or suggests any other limitations of claim 24, Applicants respectfully submit that Marcu et al. fails to anticipate claim 24 at least for this reason alone. When the PTO asserts that there is an explicit or implicit teaching or suggestion in the prior art, it must indicate where such teaching or suggestion appears in the reference. See *In re Rijckaert*, 28 U.S.P.Q.2d 1955,7 (Fed. Cir. 1993). In the Office Action, the Examiner has failed to do so.

With respect to claim 25, Applicants respectfully submit that Marcu et al. fails to teach or suggest (1) determining attributes of candidate segments associated with continuing the discourse; and (2) determining if the candidate segment is a discourse constituent based on the theory of discourse analysis and the determined attributes. In the Office Action, the Examiner has failed to point out where the teachings of the above claim limitations (1) and (2) are located in Marcu et al. Thus, claim 25 is likewise not anticipated by Marcu et al. In re Rijckaert, 28 U.S.P.Q.2d 1955,7 (Fed. Cir. 1993).

With respect to claim 27, applicants respectfully submit that Marcu et al. fails to teach or suggest conjoining the discourse constituents into a structural representation of discourse based on theory of discourse analysis classifications of the discourse constituents and at least one of a syntactic, a semantic and a lexical-semantic constraint. In the Office Action, the Examiner has failed to point out where such limitation is taught or suggested in Marcu et al. Thus, claim 27 is also not anticipated by Marcu et al. In re Rijckaert, 28 U.S.P.Q.2d 1955,7 (Fed. Cir. 1993).

With respect to the rejection of independent claims 29, 30, 32, 38 and 39, Applicants respectfully submit that all the patentability arguments made above with respect to claims 24, 25 and 27 equally apply to claims 29, 30, 32, 38 and 39 as well and, therefore, these claims are also not anticipated by Marcu et al.

With respect to the Examiner's rejection of dependent claims 26 and 31, while continuing to traverse the Examiner's characterization of the teachings of Marcu et al. used by the Examiner in rejecting these claims, Applicants respectfully submit that these claims are patentable at least by definition, by virtue of their dependence upon the patentable independent claims 25 and 30.

Claim Rejections – 35 U.S.C. §103

The Examiner has rejected claims 1-4, 11-14, 22-23 and 36 under 35 U.S.C. §103(a) as being allegedly unpatentable over Marcu et al. (U.S. patent publication No. 2002/0046018) in view of Ramaswamy et al. (U.S. patent No. 6,188,976). Applicants respectfully traverse this rejection in view of the following arguments.

Specifically, with respect to independent claims 1, 11, 22-23 and 36, as the Examiner agreed during the aforesaid telephonic interview with Applicants' representative, and as duly acknowledged in the Examiner's interview summary, Marcu et al. and Ramaswamy et al. fail to teach or suggest the claimed percolating relevance scores based on the structural representation of discourse. No such limitation is taught or suggested anywhere in Marcu et al. or Ramaswamy et al. Thus, independent claims 1, 11, 22-23 and 36 generally reciting the above or similar limitations are not unpatentable over Marcu et al. and Ramaswamy et al.

With respect to the Examiner's rejection of dependent claims 2-4 and 12-14, while continuing to traverse the Examiner's characterization of the teachings of Marcu et al. and Ramaswamy et al. used by the Examiner in rejecting these claims, Applicants respectfully submit that these claims are patentable at least by definition, by virtue of their dependence upon the patentable independent claims 1 and 11.

The Examiner has rejected claims 5-8, 15-18, 34-35 and 37 under 35 U.S.C. §103(a) as being allegedly unpatentable over Marcu et al. (U.S. patent publication No. 2002/0046018) in view of Ramaswamy et al. (U.S. patent No. 6,188,976) and further in view of Wheeler et al. (U.S.

patent No. 6,738,759). Applicants respectfully traverse this rejection in view of the following arguments.

With respect to the Examiner's rejection of claims 8, 18 and 37, Applicants respectfully noted that Wheeler et al. fails to remedy the aforesaid deficiency of Marcu et al. and Ramaswamy et al. and that claims 8, 18 and 37 also recite percolating relevance scores based on the structural representation of, and, therefore, these claims are patentable for the same reason as claims 1, 11, 22-23 and 36, as explained above.

With respect to the Examiner's rejection of dependent claims 5-7, 15-17 and 34-35 while continuing to traverse the Examiner's characterization of the teachings of Marcu et al., Ramaswamy et al. and Wheeler et al., used by the Examiner in rejecting these claims, Applicants respectfully submit that these claims are patentable at least by definition, by virtue of their dependence upon the patentable independent claims 1, 8, 11 and 18.

The Examiner has rejected claims 9-10 and 19-21 under 35 U.S.C. §103(a) as being allegedly unpatentable over Marcu et al. (U.S. patent publication No. 2002/0046018) in view of Ramaswamy et al. (U.S. patent No. 6,188,976) and further in view of Nakao (U.S. patent No. 6,205,456). Applicants respectfully traverse this rejection in view of the following arguments.

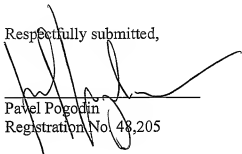
In response, with respect to the Examiner's rejection of dependent claims 9-10 and 19-21, while continuing to traverse the Examiner's characterization of the teachings of Marcu et al., Ramaswamy et al. and Nakao, used by the Examiner in rejecting these claims, Applicants respectfully submit that these claims are patentable at least by definition, by virtue of their dependence upon the patentable independent claims 8 and 18.

Conclusion

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



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